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Richard Denison
<rdenison@environmentaldefense.org>

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ChemRTK HPV@EPA, Rtk Chem@EPA,
To NCIC HPV@EPA, Karen Boswell/DC/USEPA/US@EPA,
helmet@socma.com
Skip Matthews <mtc@mchsi.com>, Karen Florini
cc <KFlorini@environmentaldefense.org>, Richard Denison
<rdenison@environmentaldefense.org>

bcc

Subject Environmental Defense comments on the Stilbene
Fluorescent Whitening Agents Category

(Submitted via Internet 6/7/06 to _____
boswell.karen@epa.gov, _____ MTC@mchsi.com, and
helmet@socma.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for the **Stilbene Fluorescent Whitening Agents Category**.

The ETAD Fluorescent Whitening Agent Task Force has, in response to EPA's Hi&P Production Volume (HPV) Chemical Challenge, submitted a test plan and robust summaries for a group of seven stilbene-based fluorescent whitening agents, with the proposal that they be considered together as a chemical category. This group of seven chemicals and one structurally similar surrogate chemical are all based on the same chemical skeleton, have similar uses and induce similar responses in studies addressing the required **SIDS** elements. The case for their consideration as a category is well-described in the test plan and we agree that these seven chemicals, **CAS#s 4404-43-7, 4193-55-9, 13863-31-5, 16090-02-1, 67786-25-8, 29637-52-3 and 16479-24-9**, meet the requirements to be considered as a category. We also think the eighth chemical, CAS # 70942-01-7, is an appropriate surrogate for the category.

Members of this chemical category have been used as whitening agents in a variety of consumer applications, including in fabric, paper and household detergents, for quite some time. Thus, there is considerable potential for consumer and environmental exposure. When released into the environment they degrade only slowly. Fortunately, these chemicals have a history of apparently safe use and exhibit low toxicity in all systems tested. Though many of the studies described in this submission are old, did not use GLP and in some cases are considered invalid due to problems with the contracted testing lab, Industrial Bio-Test Laboratories, the sum of available data, when "read across" this seven-chemical category and the surrogate, appears sufficient to address the **SIDS** elements required by the HPV Challenge.

These studies are very well-summarized in the test plan. The robust summary consists of **IUCLID** database files for each of five chemicals that were previously submitted as part of the European Risk Assessment Program on Existing Substances, plus **SIDS** Initial Assessment Reports for the surrogate and three members of the category.

Minor revisions we would suggest are the following:

1. The Task Force may wish to remove the highlighted comments of one of its reviewers of the submission for CAS# 16470-24-g.
2. The **IUCLID** database files contain a number of blank pages and headings without supporting data that could be deleted.

In summary, we find this an acceptable submission to the HPV Challenge.

Thank you for this opportunity to comment.

Hazel B. Matthews, Ph.D.
Consulting Toxicologist, Environmental Defense

Richard Denison, Ph.D.
Senior Scientist, Environmental Defense